

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X
BRITISH MARINE PLC,

Plaintiff,

13 Civ. 00839 (BMC)

-against-

AAVANTI SHIPPING & CHARTERING LTD.
ET AL,

Defendants.
-----X

Oral Argument Requested

NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of Defendants' Motion to Dismiss Second Amended Complaint Pursuant to the Doctrine of *Forum Non Conveniens* dated January 27, 2014; the declaration of Ramesh Saboo dated January 26, 2014, and the exhibits annexed thereto; the declaration of John R. Keough, III, dated January 27, 2014, and the exhibits annexed thereto; and the prior pleadings, motions and proceedings herein, defendants Anik Industries, Ltd. (f/k/a Madhya Pradesh Glychem Industries Ltd.) and Ruchi Soya Industries Ltd., by their attorneys Clyde & Co US LLP, will move this Honorable Court on February 12, 2014, at 9:30 a.m., or as soon thereafter as counsel may be heard, at Courtroom 8D of the United States Courthouse for the Eastern District of New York, 225 Cadman Plaza East, Brooklyn, New York, 11201, for an order dismissing plaintiff British Marine Plc's Second Amended Verified Complaint in Admiralty dated September 13, 2013, on the ground of *forum non conveniens*.

Dated: January 27, 2014
New York, New York

CLYDE & Co US LLP

By: /s/ John R. Keough, III
John R. Keough, III
Casey D. Burlage
The Chrysler Building
405 Lexington Avenue, 16th Floor
New York, New York 10174
Tel.: (212) 710-3900
Fax: (212) 710-3950

*Attorneys for Defendants
Anik Industries, Ltd. (f/k/a Madhya Pradesh
Glychem Industries Ltd)
Ruchi Soya Industries Ltd.*

TO: Edward W. Floyd, Esq.
Alan Van Praag, Esq.
Eaton & Van Winkle LLP
3 Park Avenue, 16th Floor
New York, NY 10016
Tel.: (212) 779-9910
Fax: (212) 779-9928

Rahul Wanchoo, Esq.
Wanchoo Law Offices, LLP
24 Old Chimney Road
Upper Saddle River, NJ 07458
Tel.: (201) 783-8560
Fax: (646) 355-0244